

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

GEORGIA SOUTHWESTERN  
RAILROAD, INC., a Corporation,

*Plaintiff,*

vs.

AMERICUS C. MITCHELL, JR.,  
an Individual,

*Defendant.*

CASE NO. 2:06cv3-B

**PROPOSED VOIR DIRE OF**  
**DEFENDANT AMERICUS C. MITCHELL, JR.**

NOW COMES AMERICUS C. MITCHELL, JR, the defendant in the above-styled case, and  
submits the following proposed voir dire:

Is there any member of the jury panel who:

1. Has ever had any contact in any way with the plaintiff, Georgia Southwestern Railroad, Inc.
2. Knows Terry Small, President of the Georgia Southwestern Railroad, Inc. whether on a professional level, such as through your job, or on a personal level, such as through church or a social or civic organization;
3. Knows David Smoot, Vice-President of the Georgia Southwestern Railroad, Inc. whether on a professional level, such as through your job, or on a personal level, such as through church or a social or civic organization;

4. Knows Jason Revalee, Operations Manager of the Georgia Southwestern Railroad, Inc. whether on a professional level, such as through your job, or on a personal level, such as through church or a social or civic organization;
5. Has ever filed worked for a railroad in any capacity;
6. Has ever worked in any railroad related industry;
7. Has contact with rail service of any kind, whether as part of your job duties or as a means of personal transportation.

Respectfully submitted,

/s/ D. Craig Allred  
DAVID E. ALLRED  
D. CRAIG ALLRED  
Attorneys for Defendant  
AMERICUS C. MITCHELL, JR.

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 21<sup>st</sup> day of May, 2007 filed the foregoing *Proposed Voir Dire* with the Clerk of the Court for the United States District Court for the Middle District of Alabama, Northern Division, using the CM/ECF system, which will send notification of such filing to:

Adrian D. Johnson, Esq.  
PARNELL & CRUM, P.A.  
Post Office Box 2189  
Montgomery, Alabama 36102-2189

/s/D. Craig Allred  
OF COUNSEL